1	RUSS, AUGUST & KABAT Benjamin T. Wang (SBN 228712) bwang@raklaw.com James S. Tsuei (SBN 285530) jtsuei@raklaw.com 12424 Wilshire Boulevard, 12th Floor Los Angeles, California 90025	
2		
3		
4		
5		
6	Telephone: (310) 826-7474 Facsimile: (310) 826-6991	
7		
8	MORRIS, MANNING & MARTIN,	L.L.P.
9	Lawrence H. Kunin, Esq. (pro hac vice) 1600 Atlanta Financial Center 3343 Peachtree Road, N.E. Atlanta, Georgia 30326 Telephone: (404) 233-7000	
10		
11		
12	Facsimile: (404) 365-9532	
13	3 Attorneys for Defendant	
14	BITPAY, INC.	
15		
16	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA SOUTHERN DIVISION	
17		
18		
19		1
20	OX LABS, INC.,	Case No. 2:18-cv-05934-MWF-KS
21	Plaintiff,	JOINT STIPULATION AND
22	vs.	[PROPOSED] ORDER TO EXTEND DISCOVERY
23	BITPAY, INC. and Does 1-10,	
24	Defendants.	DEMAND FOR JURY TRIAL
25	Dejenuanis.	
26		
2627		

Case No. 2:18-cv-05934-MWF-KS

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

The Court's December 17, 2018 Order re Jury Trial currently sets the end of non-expert discovery for August 9, 2019. See Dkt. No. 22. Counsel for Plaintiff OX Labs, Inc. and Defendant BitPay, Inc. have conferred and, subject to Court approval, stipulate to extend the non-expert discovery cut-off deadline to August 23, 2019. This stipulation is being made pursuant to Defendant's request for more time to comply with Magistrate Judge Stevenson's Informal Discovery Order dated August 7, 2019. Dkt. No. 25. The parties, through their respective counsel and subject to Court approval, thereby stipulate to extend the non-expert discovery cut-off deadline to August 23, 2019. DATED: August 8, 2019 RUSS. AUGUST & KABAT Benjamin T. Wang By: /s/ Benjamin T. Wang Attorney for Defendant BitPay, Inc. DATED: August 8, 2019 LEIDER + AYALA-BASS LLP Philip A. Leider By: /s/ *Philip A. Leider** Attorney for Plaintiff OX Labs, Inc. * all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing. IT IS SO ORDERED. DATED: , 2019 Hon. Michael W. Fitzgerald United States District Court Judge

Case No. 2:18-cv-05934-MWF-KS

CERTIFICATE OF SERVICE

I hereby certify pursuant to the Federal Rules of Civil Procedure and LR 5-3 and 5-4 that the foregoing **JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY** was served upon the attorney(s) of record for each party through the ECF system as identified on the Notice of Electronic Filing on August 8, 2019.

By: /s/ Benjamin T. Wang

Benjamin T. Wang

7